

QF 2019 - 001578

## CERTIFICATE - ATTESTATION

The undersigned authority has the honour to certify, in conformity with article 6 of the Convention  
L'autorite soussignée a l'honneur d'attester conformement a l'article 6 de ladite Convention.

- 1) that the document has been served the (date):  
que le demande a ete executee le (date):

**Tuesday 6 August 2019**

at (place, street, number):

a (localite, rue, numero):

**24 Harley Place, London, W1G 8LZ, England**

- in one of the following methods authorised by article 5:  
- dans une des formes suivantes prevues a l'article 5:

- a) ~~in accordance with the provisions of sub-paragraph (a) of the first paragraph of article 5 of the Convention~~  
~~selon les formes legales (article 5, alinea premier, lettre a)~~
- b) in accordance with the following particular method:  
selon la forme particuliere suivante:

**Served upon Bjorn Thelander at the direction of the Senior Master of the Queen's Bench Division of the Senior Courts of England and Wales by the agent for the purpose of Graham Henry Bridgman, a Solicitor of the Senior Courts of England and Wales, by a method prescribed by the internal law of England and Wales for the service of documents upon persons who are within its territory. The documents, as more fully described in the witness statement of John Frederick Talbot dated 4 August 2019 (a certificated copy of which is annexed hereto), were served as described in that witness statement with a deemed date of service as above under English court rules.**

- c) ~~by delivery to the addressee, who accepted it voluntarily~~  
~~par remise simple~~

~~the documents referred to in the request have been delivered to:~~  
~~les documents mentionnes dans la demande ont ete remis a:~~

~~-(identity and description of person):~~

~~-(identite et qualite de la personne):~~

~~-relationship to the addressee (family, business or other):~~

~~-liens de parente de subordinaion ou autres avec le desinataire de l'acts:~~

- 2) that the document has not been served, by reason of the following facts:  
que la demande n'a pas ete executee, en raison des faits suivants:

~~in conformity with the second paragraph of article 12 of the Convention, the applicant is requested to pay the expenses detailed in the attached statement~~

~~conformement a l'article 12, alinea 2 de ladite Convention, le requerant est prie de payer ou de rembourser les frais dont le detail figure au memoire ci joint~~

Annexes

Documents returned

Pieces renvoyees

in appropriate cases, documents establishing the service  
le cas echeant, les documents justificatifs de l'execution

Done at **London**

Fait a

the (date):

le:

14<sup>th</sup> August 2019  
R. H. Davison

Signature and/or stamp:

Signature et/ou cachet:





**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**VEROBLUE FARMS USA, INC.**

Plaintiff,

v.

**LESLIE A. WULF, et al.**

Defendants, Third Party Plaintiffs,

v.

**EVA EBSTEIN, et al.**

Third Party Defendants.

Civil Action No.: 19-CV-00764-L

I hereby certify that this is a true  
copy of the original

Signature   
G H Bridgman LLB Solicitor

Date 2 August 2019

**Witness Statement of Service in accordance with sub paragraph (b)  
of the first paragraph of article 5, Hague Convention  
on the Service Abroad of Judicial and  
Extrajudicial Documents In Civil or Commercial Matters**

I, **JOHN FREDERICK TALBOT**, Process Server, of Across The Pond Process Service, of Moorside, Moor Lane, Menston, LS29 6AS, England, say as follows:

1. In the matters detailed below I was acting as agent for Graham Henry Bridgman a Solicitor of the Senior Courts of England and Wales who was in turn acting at the direction of the Central Authority of England and Wales.
2. On Friday the 2<sup>nd</sup> day of August 2019 at approximately 4:40 pm I served Bjorn Thelander, one of the Third Party Defendants herein, with the within Summons in a Civil Action, together with Defendants Leslie Wulf, Bruce Hall, James Rea, and John (Ted) Rea's Answers and Affirmative Defenses to the Amended Complaint and Third Party Claims, Exhibits A to E and the Hague Convention Summary of the Document to be Served and Notice, hereafter "the Service Documents", by delivering them to and leaving them at the usual address of Bjorn Thelander at 24 Harley Place, London, W1G 8LZ, England, which is a method of service in accordance with English Court rules. Under those rules, the deemed date of service is Tuesday the 6<sup>th</sup> day of August 2019.
3. The said address was provided in a communication from the District Court at Lucerne, Switzerland, in which it was stated that Bjorn Thelander notified them that he relocated to the said address on February 28, 2019. A credit reference agency check that I conducted also indicated that the said address is his current residence. The Service Documents were delivered to the said address by my inserting them in an addressed envelope through the letterbox in the door of the said address, having gained no answer at the door.
4. Exhibited hereto marked 'A' is a bundle containing a copy of the Service Documents.

5. I believe that service has been effected, as directed by the requesting authority, in accordance with a method prescribed by the internal law of England and Wales and thus in accordance with sub paragraph (b) of the first paragraph of article 5, Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters.

I believe that the facts stated in this witness statement are true

Dated: 04 August 2019

Signed:



**JOHN FREDERICK TALBOT**

I hereby certify that this is a true  
copy of the original

Signature   
G H Bridgman LLB Solicitor

Date 7 August 2019



QF-2019-001578

N.D. Tex. 3:19-CV-00764-L

**REQUEST**  
**FOR SERVICE ABROAD OF JUDICIAL OR EXTRAJUDICIAL DOCUMENTS**  
**DEMANDE**  
**AUX FINS DE SIGNIFICATION OU DE NOTIFICATION A L'ÉTRANGER**  
**D'UN ACTE JUDICIAIRE OU EXTRAJUDICIAIRE**

Convention on the service abroad of judicial and extrajudicial documents in civil or  
commercial matters, signed at The Hague, November 15, 1965.  
*Convention relative à la signification et à la notification à l'étranger des actes judiciaires ou extrajudiciaires en matière civile  
ou commerciale, signée à La Haye, le 15 Novembre 1965.*

|   |  |
|---|--|
| <p style="text-align: center;"><b>Identity and address of the applicant</b><br/><i>Identité et adresse du requérant</i></p> <p>Aaron D. Lukken, Attorney<br/>Viking Advocates, LLC<br/>6525 Charlotte Street<br/>Kansas City, Missouri 64131 USA<br/>lukken@vikinglaw.us<br/>Tel. +1.816.200.1383</p> | <p style="text-align: center;"><b>Address of receiving authority</b><br/><i>Adresse de l'autorité destinataire</i></p> <p>The Senior Master<br/>For the attention of the Foreign Process Section<br/>Room E16<br/>Royal Courts of Justice<br/>Strand<br/>LONDON WC2A 2LL</p> |
|---|--|

The undersigned applicant has the honour to transmit in duplicate the document listed below and, in conformity with article 5 of the above-mentioned Convention, requests prompt service of one copy thereof on the addressee, i.e.,

(identity and address)

*Le requérant soussigné a l'honneur de faire parvenir en double exemplaire à l'autorité destinataire les documents ci-dessous énumérés, en la priant conformément à l'article 5 de la Convention précitée, d'en faire remettre sans retard un exemplaire au destinataire, savoir:*

**Identity and address:** **Bjorn Thelander**  
*(identité et adresse)* 24 Harley Place  
London W1G 8LZ (or wherever it may be found)

☐ (a) in accordance with the provisions of sub-paragraph (a) of the first paragraph of article 5 of the Convention.\*  
*(a) selon les formes légales (article 5, alinéa premier, lettre a).*

☒ (b) in accordance with the following particular method (sub-paragraph (b) of the first paragraph of article 5)\*:  
*(b) selon la forme particulière suivante (article 5, alinéa premier, lettre b) :*

To be served upon the Defendant at the direction of the Central Authority by Graham Bridgman, a solicitor of the Senior Courts of England and Wales (or his agent for the purpose) by a method prescribed by the internal law of England and Wales for the service of documents in domestic actions upon persons who are within its territory.

☐ (c) by delivery to the addressee, if he accepts it voluntarily (second paragraph of article 5)\*:  
*(c) le cas échéant, par remise simple (article 5, alinéa 2).*

The authority is requested to return or to have returned to the applicant a copy of the documents and of the annexes\*—with a certificate as provided on the reverse side.

*Cette autorité est priée de renvoyer ou de faire renvoyer au requérant un exemplaire de l'acte—et de ses annexes—avec l'attestation figurant au verso.*

THE PERSONS AND ENTITIES WITHIN THE UNITED STATES COMPETENT TO FORWARD SERVICE REQUESTS PURSUANT TO ARTICLE 3 INCLUDE ANY COURT OFFICIAL; ANY ATTORNEY; OR ANY OTHER PERSON OR ENTITY AUTHORIZED BY THE RULES OF THE COURT. (See U.S. declarations to the 1965 Convention at the Hague Conference website: [http://www.hcch.net/index\\_en.php?act=authorities.details&aid=279](http://www.hcch.net/index_en.php?act=authorities.details&aid=279))

**List of documents**

*Énumération des pièces*

|   |
|---|
| Hague Service Convention NOTICE                                     |
| Summary of Documents to Be Served                                   |
| Summons in a Civil Action   |
| Defendants Leslie Wulf, Bruce Hall, James Rea, and John (Ted) Rea's |
| Answers and Affirmative Defenses to the Amended Complaint           |
| and Third-Party Claims  |
| Exhibits A-E  |

Done at Oxford, the 1<sup>st</sup> August 2019

**Signature and/or stamp.**

*Signature et/ou cachet.*



\*Delete if inappropriate  
*Rayer les mentions inutiles.*

*N.D. Tex. 3:19-CV-00764-L*

**NOTICE**

*(recommended by the Fourteenth Session of  
Hague Conference of October, 1980)*

**identité et adresse du destinataire**  
*identity and address of the addressee*

**Bjorn Thelander**  
24 Harley Place  
London W1G 8LZ  
*(or wherever the defendant may be found)*

**IMPORTANT**

THE ENCLOSED DOCUMENT IS OF A LEGAL NATURE AND MAY AFFECT YOUR RIGHTS AND OBLIGATIONS. THE "SUMMARY OF THE DOCUMENT TO BE SERVED" WILL GIVE YOU SOME INFORMATION ABOUT ITS NATURE AND PURPOSE. YOU SHOULD, HOWEVER, READ THE DOCUMENT ITSELF CAREFULLY. IT MAY BE NECESSARY TO SEEK LEGAL ADVICE.

IF YOUR FINANCIAL RESOURCES ARE INSUFFICIENT YOU SHOULD SEEK INFORMATION ON THE POSSIBILITY OF OBTAINING LEGAL AID OR ADVICE EITHER IN THE COUNTRY WHERE YOU LIVE OR IN THE COUNTRY WHERE THE DOCUMENT WAS ISSUED.

ENQUIRIES ABOUT THE AVAILABILITY OF LEGAL AID OR ADVICE IN THE COUNTRY WHERE THE DOCUMENT WAS ISSUED MAY BE DIRECTED TO:

**TRÈS IMPORTANT**

LE DOCUMENT CI-JOINT EST DE NATURE JURIDIQUE ET PEUT AFFECTER VOS DROITS ET OBLIGATIONS. LES "ÉLÉMENTS ESSENTIELS DE L'ACTE" VOUS DONNENT QUELQUES INFORMATIONS SUR SA NATURE ET SON OBJET. IL EST TOUTEFOIS INDISPENSABLE DE LIRE ATTENTIVEMENT LE TEXTE MÊME DU DOCUMENT. IL PEUT ÊTRE NÉCESSAIRE DE DEMANDER UN AVIS JURIDIQUE.

SI VOS RESSOURCES SONT INSUFFISANTES, RENSEIGNEZ-VOUS SUR LA POSSIBILITÉ D'OBTENIR L'ASSISTANCE JUDICIAIRE ET LA CONSULTATION JURIDIQUE SOIT DANS VOTRE PAYS SOIT DANS LE PAYS D'ORIGINE DU DOCUMENT.

LES DEMANDES DE RENSEIGNEMENTS SUR LES POSSIBILITÉS D'OBTENIR L'ASSISTANCE JUDICIAIRE OU LA CONSULTATION JURIDIQUE DANS LE PAYS D'ORIGINE DU DOCUMENT PEUVENT ÊTRE ADRESSÉES :

Legal Aid of Northwest Texas  
1515 Main Street  
Dallas, TX 75201  
Tel. +1 (214) 748-1234



N.D. Tex. 3:19-CV-00764-L

**SUMMARY OF THE DOCUMENT TO BE SERVED**

**ELEMENTS ESSENTIELS DE L'ACTE**

**Convention on the service abroad of judicial and extrajudicial documents in civil or commercial matters, signed at The Hague, November 15, 1965.**

*Convention relative à la signification et à la notification à l'étranger des actes judiciaires et extrajudiciaires en matière civile ou commerciale, signée à La Haye, le 15 Novembre 1965.*

**(article 5, fourth paragraph)**

*(article 5, alinéa 4)*

**Name and address of the requesting authority:** Aaron D. Lukken, Attorney  
Viking Advocates, LLC  
6525 Charlotte Street  
Kansas City, Missouri, USA  
*Nom et adresse de l'autorité requérante :* lukken@vikinglaw.us  
Tel. +1.816.200.1383

**Particulars of the parties\*:**

*Identité des parties :* VEROBLUE FARMS USA, INC.; *Plaintiff*  
LESLIE A. WULF, BRUCE A. HALL, JAMES REA, JOHN E. REA, and KEITH DRIVER,  
*Defendants/Third Party Plaintiffs*  
EVA EBSTEIN, JENS HAARKOETTER, BJORN THELANDER, ANDERS WESTER, NORMAN  
MCCOWAN, DR. OTTO HAPPEL, and ALDER AQUA, LTD., *Third Party Defendants*

**JUDICIAL DOCUMENT\*\***

**ACTE JUDICIAIRE**

**Nature and purpose of the document:**

*Nature et objet de l'acte :* To inform the Third Party Defendants of claims against them, and to demand their appearance at court.

**Nature and purpose of the proceedings and, where appropriate, the amount in dispute:**

*Nature et objet de l'instance, le cas échéant, le montant du litige :* A civil action has been commenced against the Defendants, who in turn accuse the Third Party Defendants of, inter alia, fraud and breach of fiduciary duty.

**Date and place for entering appearance\*\*:**

*Date et lieu de la comparution :* Within 21 days from service the Third Party Defendants must file an answer and appearance in the United States District Court, 1100 Commerce Street, Dallas, TX 75242.

**Time limits stated in the document\*\*:**

*Indication des délais figurant dans l'acte:* 21 days

**NO COURT HAS ISSUED A JUDGMENT IN THIS MATTER**

\* If appropriate, identity and address of the person interested in the transmission of the document.

*S'il y a lieu, identité et adresse de la personne intéressée à la transmission de l'acte.*

\*\* Delete if inappropriate.

*Rayer les mentions inutiles.*